

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. CR 18-4176 JB

STERLING ISLANDS, INC.,
AL-ZUNI GLOBAL JEWELRY, INC.,
JAWAD “JOE” KHALAF,
NADER KHALAF,
NASHAT “NASH” KHALAF,
ZAHER MOSTAFA, and
TAHA “TOM” SHAWAR,

Defendants.

UNOPPOSED MOTION TO EXCEED PAGE LIMITS

Pursuant to D.N.M.LR-Cr. 47.9, Defendants respectfully move the Court for an order allowing them to file their Reply in Support of Their Rule 12(b) Motion to Dismiss Counts 2 and 3, and to Partially Dismiss Count 1, of the Indictment, in excess of the 12-page limit.

Pursuant to D.N.M.LR-Cr. 47.1 & 47.2, opposing counsel does not oppose this motion.

WHEREFORE, Defendants request that the Court enter an order allowing them to file their Reply in Support of Their Rule 12(b) Motion to Dismiss Counts 2 and 3, and to Partially Dismiss Count 1, of the Indictment, in excess of the 12-page limit.

Respectfully submitted,

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

By /s/ Matthew M. Beck

Matthew M. Beck

P.O. Box 1888

Albuquerque, New Mexico 87103

Telephone: (505) 765-5900

Facsimile: (505) 768-7395

Email: mbeck@rodey.com

Attorneys for Defendant Zaher Mostafa

FREEDMAN, BOYD, HOLLANDER, GOLDBERG,
URIAS & WARD, P.A.

By /s/ Nancy Hollander
John Boyd
Nancy Hollander
P.O. Box 25326
Albuquerque, New Mexico 87125-0326
Telephone: 505.842.9960
Facsimile: 505.842.0761
Email: jwb@fbdlaw.com
nh@fbdlaw.com

*Attorneys for Defendants Nashat Khalaf and Al-Zuni
Global Jewelry, Inc.*

PEIFER, HANSON & MULLINS, P.A.

By /s/ Mark T. Baker
Mark T. Baker
Carter B. Harrison IV
P.O. Box 25245
Albuquerque, New Mexico 87125
Telephone: (505) 247-4800
Facsimile: (505) 243-6458
Email: mbaker@peiferlaw.com
charrison@peiferlaw.com

*Attorneys for Defendants Sterling Islands, Inc., and Jawad
Khalaf*

--and--

AHMAD ASSED & ASSOCIATES

By /s/ Ahmad Assed
Ahmad Assed
Richard Moran
818 5th Street NW
Albuquerque, New Mexico 87102
Telephone: 505-246-8373
Facsimile: 505-246-2930
Email: ahmad@assedlaw.com
richard@assedlaw.com

Attorneys for Defendant Nader Khalaf

APPROVED:

(Approved 03-22-19)

Sean J. Sullivan

Kristopher N. Haughton

Assistant United States Attorneys

United States Attorney's Office

District of New Mexico

201 Third St. NW, Suite 900

Albuquerque, NM 87102

Sean.J.Sullivan@usdoj.gov

Kristopher.Houghton@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2019, I filed the foregoing pleading electronically through the CM/ECF system, which caused all parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

By /s/ Matthew M. Beck
Matthew M. Beck